

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION AT COLUMBUS

FILED  
RICHARD W. NAGEL  
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APR 29 PM 2:28

U.S. DISTRICT COURT  
SOUTHERN DIST. OHIO  
EAST DIV. COLUMBUS

2:24 CV 2032

Alexander Q Amicucci  
1370 Great Hunter Ct  
Grove City, OH 43123  
(PLAINTIFF)

V

Franklin County Board of Elections  
1700 Morse Rd  
Columbus, OH 43229  
(DEFENDANT)

Case Number:

JUDGE WATSON

**COMPLAINT**

MAGISTRATE JUDGE DEEVERS

1. Parties to the action:

a. Plaintiff:

- i. Alexander Q Amicucci
- ii. 1370 Great Hunter Court
- iii. Grove City, Ohio 43123
- iv. 614-946-4990

b. Defendant:

- i. Franklin County Board of Elections
- ii. 1700 Morse Road
- iii. Columbus, Ohio 43229

2. Jurisdiction lies with the district court, per 28 U.S.C. 1343(a)(3), to try this case because the Board discriminated against me by denying my constitutionally protected right to run for office of US Representative from Ohio.

3. Statement of Claim:

a. The excessive signature requirements of 3513.257(C) are unconstitutional and a poor indicator of worthiness, so I collected just 25 signatures. This is as many signatures as is required of a minor party candidate and an independent candidate from a district with 5000 or less electors for the most recent gubernatorial election. I turned my petition in before 4:00 PM on March 18, 2024.

b. I attended the Board of Elections meeting on April 1, 2024. I filled out the form to speak at the meeting so I could make my case for inclusion to the Board. My name wasn't announced on the list of

approved speakers and my petition was denied due to a lack of signatures. My petition ended up having 10 invalid signatures and it was denied for a lack of signatures. I was not given the chance to correct the issue since it was clear I wasn't going to collect the 2691 signatures required. This is 54 times the amount a major party candidate is required to collect. One's ability to collect signatures from strangers is not a morally valid reason to deny a potential candidate for the House of Representatives from ballot access, given that our entire moral standing in this country is "We the People."

4. Relief:

- a. The Board failed in their duty by denying my right to run for the office of US Representative from Ohio, by denying me the right to make my case to them, and by discriminating against me by accepting the petition and certifying the Primary results of a constitutionally ineligible incumbent, per Article 5, Section 8 of the Ohio Constitution, while enforcing unconstitutional signature requirements. Even a 3 judge panel ordered the state from enforcing portions of 3513.257 that deprive a person from guaranteed rights. (318 F. Supp. 1262(S.D. Ohio 1970)).
- b. To demonstrate the inherent bias towards incumbents and the two party system in general, it's important to note that, including Representative Beatty, there are 7 incumbents for the office of US Representative from Ohio running that are currently constitutionally ineligible. Senator Sherrod Brown is also ineligible. The relief I seek is inclusion on the ballot of the November 5, 2024 General Election as an Independent candidate.

I state under penalty of perjury that the foregoing is true and correct.

Executed on this 29 day of April, 2024

A handwritten signature in black ink, consisting of a large, stylized capital 'A' followed by a horizontal line that extends to the right and then curves slightly upwards at the end.

Signature of Plaintiff